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Attorneys for Defendant Crly Taitz

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

LISA LIBERI and PHILIP J. BEG,
ESQUIRE and THE LAW OFFICES OF
PHILIP J. BERG and EVELYN ADAMS
a/k/a MOMMA E and LISA M. OSTELLA
and GO EXCEL GLOBAL,

Plaintiffs,
vs.

ORLY TAITZ, a/k/a DR. ORLY TAITZ,
a/k/a LAW OFFICES OF ORLY TAITZ;
a/k/a WWW.ORLYTAITZ.ESQ.COM
a/k/a WWW.REPUBX.COM a/k/a ORLY
TAITZ, INC. and DEFEND OUR
FREEDOMS FOUNDATIONS, INC. and
YOSEF TAITZ and THE SANKEY FIRM
and SANKEY INVESTIGATIONS, INC.
and NEIL SANKEY and JAMES
SUNQUIST and ROCK SALT
PUBLISHING and LINDA SUE
BELCHER a/k/a LINDA S. BELCHER
a/k/a LINDA STARR; a/k/a
NEWWOMENSPARTY a/k/a
STITCHENWITCH a/k/a EVA BRAUN
a/k/a WEB SERGEANT a/k/a KATY a/k/a
WWW.OBAMACITIZENSHIPDEBATE.
ORG and EDGAR HALE a/k/a JD
SMITH; and CAREN HALE; and PLAINS
RADIO NETWORK, a/k/a PLAINS
RADIO NETWORK, INC. a/k/a PLAINS
RADIO; and BAR H FARMS; and KPRN
AM 1610; and DOES 1 through 200
Inclusive,

Defendants.

CASE NO. 8:11-cv-00485-AG (AJW)

**EVIDENTIARY OBJECTIONS TO
THE DECLARATION OF LISA
LIBERI SUBMITTED IN SUPPORT
OF ORLY TAITZ'S REPLY TO
PLAINTIFFS' OPPOSITION TO
ANTI-SLAPP MOTION TO DISMISS**

Date: June 13, 2011
Time: 10:00 a.m.
Dept.: Crtrm 10D

[Memorandum of Points and Authorities;
Request for Judicial Notice; Declaration of
Orly Taitz; and Evidentiary Objections to
the Declaration of Philip J. Berg Filed
Concurrently Herewith]

Complaint Filed: May 4, 2009


Defendant Orly Taitz ("Taitz") hereby objects to the Declaration of Lisa Liberi filed and served in support of Plaintiffs' opposition to Anti-SLAPP motion to dismiss as follows:

No.	DESIGNATED TESTIMONY	EVIDENTIARY OBJECTION(S)
1	Page 1, line 27 to page 2, line 6. "I filed suit against Ms. Taitz and the other Defendants as a result of the illegal background check conducted on me; the illegal access of my credit reports; the illegal disclosure of my full social security number, date of birth, place of birth, mother's maiden name, father's name, home address, telephone number, the harassment of my friends and family, and Ms. Taitz's disclosure of my private details to John Mark Allen, my son's father who my son and I were provided protection from as a result of the crimes committed against us."	Relevance; lack of foundation; improper lay-opinion; opinion as to ultimate fact. FRE Rules 401-402; 601-602; 701-705; 901-902.
2	Page 2, lines 8-9. "Ms. Taitz continues twisting the reasons Plaintiffs filed suit and continues misstating the truth."	Relevance; lack of foundation. FRE Rules 401-402; 601-602.
3	Page 2, lines 17-20. "In fact, a dangerous criminal, Ruben Nieto,	Relevance; lack of foundation; improper lay-opinion; opinion as to

No.	DESIGNATED TESTIMONY	EVIDENTIARY OBJECTION(S)
	who attempted to get paid by Ms. Taitz live in Albuquerque, New Mexico, forty-five [45] minutes from my house.”	ultimate fact. FRE Rules 401-402; 601-602; 701-705; 901-902.
4	Page 2, lines 22-26. “Ms. Ostella was set up as Ms. Taitz’s customer contact in Ms. Taitz’s PayPal account. This did <u>not</u> give Ms. Ostella access to Ms. Taitz [sic] accounts, but instead it carbon copied Ms. Ostella’s email address for PayPal payment requests from Ms. Taitz’s PayPal account.”	Relevance; lack of foundation. FRE Rules 401-402; 601-602.
5	Page 3, lines 1-4. “Further, Ms. Taitz has harassed every governmental agency in New Mexico to the point they called in the New Mexico Attorney General to put a stop to Ms. Taitz [sic] harassing and illegal behaviors [sic].”	Relevance; lack of foundation; improper lay-opinion; hearsay; opinion as to ultimate fact. FRE Rules 401-402; 601-602; 701-705; 801-807; 901-902.
6	Page 3, lines 7-8. “...she continued calling on them to further cyber-stalk; cyber-harass; and cyber-bully me, which they did ”	Relevance; lack of foundation; improper lay-opinion; opinion as to ultimate fact. FRE Rules 401-402; 601-602; 701-705; 901-902.
7	Page 3, lines 17-25.	Relevance; lack of foundation;

1	No.	DESIGNATED TESTIMONY	EVIDENTIARY OBJECTION(S)
2 3 4 5 6 7 8 9 10 11 12		<p>“This is a result of Orly Taitz publishing and continued publishing of her threats against me, her calling for her supporters for help regarding me; and her continued publishing of my full Social Security number, my maiden name, my mother’s maiden name, my father’s name, my home address, my place of birth, my date of birth and my husband’s primary identification information.”</p>	<p>improper lay-opinion; opinion as to ultimate fact. FRE Rules 401-402; 601-602; 701-705; 901-902.</p>
13 14 15 16 17 18 19 20 21 22	8	<p>Page 3, line 25 to page 4, line 2.</p> <p>“As a result, my husband and my identities have been stolen, our credit has been used repeatedly, accounts have been set up fraudulently in our names using our identifying information, my credit reports show me residing in States I have never resided including but not limited to Massachusetts and Iowa.”</p>	<p>Relevance; lack of foundation; improper lay-opinion. FRE Rules 401-402; 601-602; 701-705; 901-902.</p>
23 24 25 26 27 28	9	<p>Page 4, lines 5-6.</p> <p>“... harassment, cyber-stalking, cyber-bullying, cyber-harassment, and other illegal acts...”</p>	<p>Relevance; lack of foundation; improper lay-opinion; opinion as to ultimate fact. FRE Rules 401-402; 601-602; 701-705; 901-902.</p>

1	No.	DESIGNATED TESTIMONY	EVIDENTIARY OBJECTION(S)
2	10	Page 4, lines 12-13 "My medical bills to date were provided to Judge Robreno on December 20, 2010."	Lack of foundation; hearsay. FRE Rules 401-402; 801-807.
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6	11	Page 4, lines 19-20. "Ms. Taitz' is well aware of the fact I do <u>not</u> reside in the State of California."	Lack of foundation. FRE Rules 401-402.
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10	12	Page 4, line 20. "Ms. Taitz has stalked my son..."	Relevance; lack of foundation; improper lay-opinion; opinion as to ultimate fact. FRE Rules 401-402; 601-602; 701-705; 901-902.
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15	13	Page 5, lines 23-24. "Ms. Taitz also threatened to have Ms. Ostella's children professionally kidnapped."	Relevance; lack of foundation. FRE Rules 401-402; 601-602.
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19	14	Page 5, line 24 to page 6, line 8. "A man in Albuquerque, NM attempted to get paid by Ms. Taitz in three [3] consecutive money requests totaling Twenty-Five Thousand [\$25,000.00] Dollars. The requests came in ccnsecutively in the amount of Nine Thousand [\$9,000.00] Dollars and two (2) in the amount of Eight Thousand [\$8,000.00] Dollars totaling Twenty-Five	Relevance; lack of foundation; hearsay. FRE Rules 401-402; 601-602; 801-807.
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1	No.	DESIGNATED TESTIMONY	EVIDENTIARY OBJECTION(S)
2		[\$25,000.00] Dollars, as on file with this	
3		court.”	
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6		DATED: May 27, 2011	DACK MARASIGAN, LLP
7			MARTIN E. DACK
8			JAYSON Q. MARASIGAN
9			By: 
10			JAYSON Q. MARASIGAN
11			Attorneys for Defendant Orly Taitz
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